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THE WASHINGTON COUNTY DEMOCRATIC PARTY EXECUTIVE COMMITTEE SUPPORTS A REASONABLE RANGE OF ALTERNATIVES INSTEAD OF THE PROPOSED COAL FIRED PLANT AT THE TOQUOP NEVADA PROJECT

AS PER THE LETTER SENT TO THE B.L.M.
BY. CHAIR: WAYNE HOLLAND, UTAH
STATE DEMOCRATIC PARTY 11/4/2007

December 4, 2007

Bureau of Land Management
Ely Field Office
Attention: Jane Peterson
HC 33, Box 33500
Ely, Nevada 89301-9408

Dear Ms. Peterson,

The Utah State Democratic Committee (USDC) appreciates this opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Toquop Energy Project in Lincoln County, Nevada. We request you add our address to your mailing list to receive any additional information mailed to the public regarding this project, including the Final Environmental Impact Statement and associated Record of Decision. Documents may be mailed via compact disc.

The USDC is disappointed the Bureau of Land Management (BLM), and by extension the current administration, refuse to recognize both the environmental consequences of continuing to expand our reliance on coal to meet our energy needs, and the economic benefits of developing increasingly viable alternatives to coal and other traditional sources of power. The BLM and other public agencies have both a legal and moral responsibility to fully consider the environmental consequences of actions within their jurisdiction, and to fully explore the true economic costs and benefits of those actions in light of current available technology.

Western states like Utah and Nevada are in an excellent position to become global leaders in the development of alternative energy sources. The construction of the world's largest solar power plant outside of Las Vegas now nearing completion, and pending construction of a massive wind farm in Beaver County, Utah, prove viable and clean alternative energy sources exist in the region. These developments should only be the beginning of a new energy boom in the Great Basin, with huge job creation potential far exceeding any older more polluting technology will create in either the short or long-term.

The EIS completely fails to take into consideration these emerging technologies or the incredible geo-thermal potential of the Great Basin the earth's extremely thin crust make possible here unlike almost any other place on earth. According to one recent report, both the Western Governor's Association (WGA) and U.S. Geological Survey (USGS) have long recognized the potential for geothermal development in Nevada. "In January

of 2006, the Geothermal Taskforce of the Western Governor's Association (WGA) estimated that Nevada could install an additional 1,488 MW of geothermal power economically by 2015 and estimated potential by 2025 as high as 2,895 MW from identified resource areas."[1]

Unfortunately, the EIS also misleads the public regarding the cost of implementing new alternative energy technologies. This is particularly true in the case of wind power. The 2003 Final EIS relied upon heavily in this year's EIS, appears to be the only place where the cost of various methods of electrical power generation are considered. The cost per installed kW for wind power is considered to be $12,002 and the cost of photovoltaic power is considered to be between $5,000 and $10,000 according to the 2003 Final EIS.[2] Ironically, cost was the reason coal was eliminated "from detailed consideration in the 2003 EIS" along with other alternatives such as wind and solar technology. As of 2003, the cost of coal was $1,246 per installed kW but generating costs were more expensive than wind and competitive with solar, especially if the $0.017/kW-hr tax credit for wind and solar were taken into account.[3]

The BLM failed to update the installed cost per kW in its 2007 EIS. Data provided by the California Energy Commission shows significant reductions in cost below that reported in the 2003 Final EIS for the Toquop Project. While the cost of photovoltaic technology remains at the low end of the estimated cost provided in the 03 Final EIS at between $4,500 and $6,000 per installed kW, wind turbine technology now runs between $800 and $3,500 per installed kW.[4] When compared with the $1,246 per installed kW cost for coal cited in the 2003 Final EIS, wind now seems incredibly competitive and solar more so than the BLM originally gave these potential alternatives credit for.

Any cost/benefit analysis prepared by the BLM or any other federal agency should take into account the potential for negative and positive economic impacts associated with the environmental consequences of the proposed action, as well as the potential for job creation associated with the implementation of the technology being proposed. The development of alternative sources such as wind and solar technology has had demonstrable positive impacts in regions where it is being developed. CBS News recently reported West Texas is seeing a significant energy boom generated exclusively by an explosion in wind energy development. According to Greg Wortham, the head of the West Texas Wind Energy Consortium, "West Texas is the 4th largest nation in wind energy today...There's Germany, Spain, India, and West Texas." CBS News also reported a building boom was underway in West Texas as a result of the construction of hundreds of windmills, ranchers were able to significantly supplement their income, and the local college had expanded course offerings to include training in wind technology.[5]

In addition to failing to adequately address actual/potential alternative energy producing technologies and associated economic or environmental benefits, both the 2003 Final EIS and current Draft EIS fail to adequately address the potential contribution of greenhouse

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[1] *Goethermal Resource Development in Nevada –2006;* Geothermal Energy Association (GEA), Daniel J. Fleischmann, December 2006

[2] *Toquop Energy 2003 Final Environmental Impact Statement;* Chapter 2, page 46

[3] Ibid.

[4] www.energy.ca.gov/distgen/economics/capital.html; California Energy Commission, Distributed Energy Resource Guide, December 2007

[5] *Winds of Change Blow in Texas;* CBS News, December 2, 2007

would be generated through the steam cycle, thus requiring approximately three times as much water (approximately 20,000 acre-feet per year) for cooling than needed for the gas fired technology."[8]

The Draft EIS indicates demand for water under the proposed action would be significantly less than that predicted in the 2003 Final EIS – around 2,500 acre feet per year – but fails to offer adequate explanation for this large discrepancy. Regardless, the Draft EIS completely fails to consider the cumulative impact of the demand for water associated with the Toquop Project together with moves to drill wells and pipe water from the Snake Valley on the Utah/Nevada border to Las Vegas. As with Toquop's potential contribution to climate change, its individual impact on water resources may be relatively small but cumulatively could have a significant impact, especially when considered in light of growing demand. The BLM needs to take these cumulative impacts on the regional water supply into account and provide more detailed analysis than it does within the Draft EIS.

In light of the legal and moral obligations of the BLM to adequately address and consider a reasonable range of alternatives to actions it considers, and to thoroughly review the economic, environmental, and social consequences of said actions over time, the USDC calls upon the BLM to rewrite and submit for public review a new Draft EIS for the Toquop Project. Careful analysis and consideration should be provided of the contribution the Toquop Project as proposed will have on climate change and the associated long-term impact on both Nevada and Utah's water supply, the ski industry in Utah, Colorado and other western states, and the impact on air quality in downwind communities such as St. George, Utah. A much more careful and considered analysis of the impacts on the region's water resources, especially in light of proposals to begin taking water from aquifers that straddle the Utah/Nevada border, is of extreme importance in this and all future analyses. All projects requiring additional water should be considered in light of population growth within the region, available resources, and potential changes to the climate and associated impacts on water availability.

The USDC thanks the BLM again for this opportunity to be heard on the Toquop Project and looks forward to reviewing your final decision and associated EIS.

Sincerely,

Wayne Holland
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Salt Lake City, UT 84111
(801)328-1212

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[8] *Toquop Energy 2003 Final Environmental Impact Statement;* Chapter 2, page 45